

Inphonex.com LLC
3044 NW 72nd Ave
Miami FL 33122

Annual 47 C.F.R. & 64.2009(e) CPNI Certification
EB Docket 06-36

Date Signed: September 18th, 2008

Name of Company Covered by this Certification: 499 Filer ID

Inphonex.com LLC

824926

Name of signatory: **Mr. Kooi Lim**

Title of signatory: **CEO**

I, Kooi Lim, certify that I am an officer of Inphonex.com LLC, an interconnected VoIP provider, and acting as an authorized agent of the company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's CPNI rules, found at 47 C.F.R. §64.2001 et seq.

Attached to this certification is an itemized checklist of the procedures Inphonex has in place to protect customers' CPNI, as well as an explanation of how Inphonex's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. (See attached affidavit)

To be clear, the Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commission's, the court system or at the commission against data brokers) against data brokers in the past year.

Furthermore, the company has also not received any customer complaints in the past year concerning the unauthorized use of CPNI.

Regretfully, the Company did not file this certification by March 1, 2008, as required by the EPIC CPNI Order due to an inadvertent internal oversight regarding the newly implemented requirement (which has since been addressed), as well as some confusion regarding the need for an interconnected VoIP service provider such as Inphonex to submit the CPNI certification. To be clear, Inphonex fully understands and appreciates the importance of ensuring that adequate CPNI safeguards are in place and that the Commission's strengthened privacy rules are fully enforced to the benefit of all consumers.

Kooi Lim
CEO

9/18/08

been reviewed and updated in accordance with the changes implemented with the EPIC CPNI Order. The Companies procedures include, but are not limited to the following:

- + We authenticate clients account credentials – password and account id. For backup, email address on record and/or address on record, before disclosing CPNI on client initiated telephone contacts or business office visits.
- + If, on a customer initiated call, the customer does not provide the correct password, call detail can only be provided by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
- + We have instituted a policy where our customer representatives are NOT allowed to prompt the customer for the correct password by asking for readily available biographical information, or account information.
- + Clients are provided online access to each client's own account information using client controlled password. If client loses password, client can, by his/her own, reset password. The client password reset requires a valid email on record in order for the reset to work
- + There is a procedure to notify clients of account changes, by email, to email address on record.

✦ **Actions taken against data brokers and responses to customer complaints.**


There have been no actions taken against data-brokers and there have been no customer complaints regarding this type of issue.

✦ **Procedures for notifying law enforcement of CPNI security breaches.**

The company has adopted procedures to notify law enforcement of CPNI security breaches, and ensures that all data are kept for at least 2 years. We have taken steps to ensure that all employees are familiar with this requirement.

I hereby attest that the foregoing is true and correct to the best of my knowledge.


Kooi Lim, CEO
Inphonex.com, LLC
9/18/08


NOTARY PUBLIC - STATE OF FLORIDA
Sandra Prek
Commission #DD652272
Expires: MAY 04, 2011
BONDED THRU ATLANTIC BONDING CO., INC.

Statement and Affidavit Confirming Annual CPNI Compliance

+ Identification of CPNI and Service Affected by CPNI Rules.

The company has established procedures and trained employees having access to customer data on CPNI consistent with the definition of CPNI set forth in the FCC's rules.

+ Uses of CPNI without customer approval

The company has established procedures and trained employees having access to, having occasion to use CPNI, to identify, consistent with FCC Rules, when it is allowable to use CPNI without requiring client authorization.

+ Uses of CPNI requiring customer authentication

The company has established procedures and trained employees having access to, or having occasion to use CPNI, in how to identify and properly use CPNI requiring client authorization, consistent with the FCC's CPNI rules.

+ Employee training and discipline

The company has established procedures and trained employees having access to customer data on CPNI consistent with the definition of CPNI and the Commission's strengthened safeguards to protect against unauthorized disclosure. The company has an express disciplinary process in place in the event CPNI policies and procedures are not followed. In this regard, as access to CPNI is considered confidential and proprietary to Inphonex, it falls within the disciplinary policy of the company information security policy. As such, if any employee conduct access to CPNI that is not in compliance with FCC rules, the company action could be, for an employee, denial of access to CPNI up to termination of employment.

+ Record of Customer CPNI Approval/Non-Approval

At such time when the company wishes to initiate use of CPNI for marketing to its clients with corresponding launch of a notification and Opt-In/Out process, the company will develop and utilize a system of maintaining and use. Only management is allowed any marketing efforts when it comes to areas that concerns CPNI.

+ Procedures protecting against disclosure of CPNI

Since the company's inception, as an interconnected VoIP provider, the company has implemented procedures that comply with all FCC CPNI rules. These procedures have